

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

MEREDITH CHADWICK RAY and)	
PHILLIP RAY,)	
)	
Plaintiffs,)	CASE NO: 3:07-cv-175
)	
vs.)	
)	
FORD MOTOR COMPANY, et al.)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR LEAVE TO AMEND COMPLAINT

Plaintiffs move the Court for permission to amend the complaint to add as parties Defendants Pontiac Coil, Inc and Visteon Corporation. As grounds for Plaintiffs' Motion for Leave to Amend, Plaintiffs would show unto the Court that based on testimony obtained from Ford's corporate representative, Mark Taylor, on September 14, 2007, Plaintiffs have learned that Ford alleges that the brake transmission shift interlock (BTSI) component parts were designed and manufactured by outside manufacturers, that testing and documentation of the subject brake transmission shift interlock (BTSI) parts were performed at outside manufacturers, and that if the brake transmission shift interlock (BTSI) of the Plaintiffs' vehicle performs as alleged then it does not meet its design intent.

Because Ford has identified outside component manufacturers who may have liability and knowledge regarding the subject brake transmission shift interlock (BTSI) system, Plaintiffs will be unduly prejudiced if not allowed sufficient time to amend the complaint and develop discovery regarding the newly discovered component part

manufacturers. Further, and consequently, Plaintiffs request that the current scheduling order deadlines and trial setting be reset to allow sufficient time to develop this case against all proper parties. Plaintiffs' counsel has conferred with counsel for Ford who is in agreement with this motion.

/s/ D. Michael Andrews

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CERTIFICATE OF SERVICE

I hereby certify that I have this date electronically filed the foregoing document with the Clerk of Court using the CM/ECF system to the following CM/ECF participants:

Bradley J. McGiboney
Huie, Fernambucq & Stewart, LLP
Three Protective Center
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This 11th day of **October**, 2007.

/s/ D. Michael Andrews
Of Counsel